

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FELDMAN & PINTO, P.C.	:	CIVIL ACTION
	:	
v.	:	NO. 11-cv-5400
	:	
MARTHA LYNN SEITHEL	:	
and	:	
SEITHEL LAW, LLC,	:	

**DEFENDANTS' EMERGENCY MOTION FOR PARTIAL STAY OF
PRELIMINARY INJUNCTION ORDER PENDING APPEAL**

Defendants, Martha Lynn Seithel ("Seithel") and Seithel Law, LLC ("Seithel Law") (hereinafter collectively "Defendants"), hereby respectfully submit this Emergency Motion to partially stay the enforcement of the Preliminary Injunction Order filed by this Honorable Court on December 22, 2011 and entered on December 23, 2011. A copy of the Order is attached as Exhibit "A". More specifically, Defendants are seeking a stay of paragraphs four (4) and six (6) of the Preliminary Injunction Order until the Court's Order can be reviewed by the United States Court of Appeals for the Third Circuit. A stay of enforcement of these two provisions will not cause substantial harm to Plaintiff or the general public. On the other hand, failure to stay enforcement of these two provisions will cause Defendants serious and irreparable injury. The basis of this Motion is more fully set forth in the accompanying Memorandum of Law in support of Defendants' Emergency Motion which

is incorporated hereto by reference.

Respectfully submitted,

SPECTOR GADON & ROSEN, P.C.

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Date: 12/30/11